EXHIBIT A

UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING PHARMACY, INC. PRODUCTS LIABILITY LITIGATION)
) MDL No. 2419
) Dkt. No 1:13-md-2419 (RWZ)
THIS DOCUMENT RELATES TO:)
)
All Cases Against the Saint Thomas)
Entities)
)
)
)

AFFIDAVIT OF LELA HOLLABAUGH

- I, Lela Hollabaugh, state that:
- 1. I am an attorney at the law firm of Bradley Arant Boult Cummings, LLP,
 Roundabout Plaza, 1600 Division Street, Suite 700, Nashville, Tennessee, and I represent Saint
 Thomas West Hospital, formerly known as St. Thomas Hospital, Saint Thomas Network, and
 Saint Thomas Health in the above-captioned actions.
- 2. I am a member of the Bar of the State of Tennessee and admitted to practice in the Tennessee State Courts.
- 3. I am a member in good standing and there are no disciplinary proceedings pending against me as a member of the Bar in any jurisdiction in which I am admitted; and
- 4. I am familiar with the Local Rules of the United States District for the District of Massachusetts.

SIGNED UNDER THE PENALTIES OF PERJURY THIS $3^{\rm RD}$ DAY OF DECEMBER 2015.

/s/ Lela Hollabaugh [paper document bears original signature]
Lela Hollabaugh